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COUNCIL OF CHIEF STATE SCHOOL OFFICERS

One Massachusetts Avenue, NW, Suite 700, Washington, DC 20001-1431 • 202/408-5505 • FAX 202/408-8072 http://www.ccsso.org

June 9, 1998

FEDERAL-STATE JOINT BOARD ON UNIVERSAL SERVICE (CC DOCKET NO. 96-45).

William E. Kennard Chairman Federal Communications Commission 1919 M Street, NW Washington, D.C. 20554

Dear FCC Chairman Kennard:

FEDERAL COMMUNICATIONS OF CECRETARY

The Council for Chief State School Officers (CCSS0) applauds once again the Federal Commissions Commission for decisions made to implement and fund the universal services including support for schools and libraries. Our members and staff have worked tremendously hard over the past year to get this program off the ground and to help states and local officials to develop long-term technology plans.

We are writing to urge the Commission to fully-fund the applications submitted to the Schools and Libraries Corporation this year. Across the nation, state and local officials, parents, teachers, business representatives and school administrators have worked extraordinarily hard to realize the education and informational benefits of telecommunications technologies. Any pull back or elimination of support mechanisms at this time would have a devastating impact on our students, schools, libraries and all of those persons across the country who have worked so incredibly hard to prepare the applications and readied their institutions for a major advance in the use of modern telecommunications technologies. In making its decision, the Commissioners must look beyond the immediate demands of special interests and recognize the efforts of education officials who are attempting to prepare students for the 21st. Century and the growing demand for a technologically-literate workforce.

The Council for Chief State School Officers (CCSSO) strongly urges the Commission to endorse specific and adequate mechanisms for creating a universal service fund that can assist all of the nation's schools, libraries, and rural health care centers to access advanced telecommunications services. A reasonable and fair decision by the Commission on third and fourth quarter contributions to the universal service fund could have a positive and substantial impact on the quality of state and local educational programs and services.

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State and local education officials have come to recognize that universal service support mechanisms, as authorized by the Telecommunications Act of 1996 ("Act"), are extraordinarily important for advancing the availability of learning technologies in the schools and beyond formal classroom settings. We have substantial evidence that the prospect of discounted telecommunications services is having a catalytic effect on school planning efforts for meeting the challenges associated with higher educational standards and increased opportunities for learning.

Our Council is concerned that the Commission may act to reduce or eliminate funds below amounts estimated by the Federal-State Joint Board on Universal Service and subsequently approved by the Commission. Decreasing the allotment for supporting school and library discounts for telecommunications service would have a devastating effect on the states and local communities which are coupling the promises of universal service discounts to their own investment strategies for learning technologies. Long-term school finance plans are now inextricably tied to technology plans that meet the requirements of the E-Rate program.

Most states are pursuing the goals of equalizing access to education and expanding electronic information for learning in tandem. Our poorest schools, in particular, are energized by the opportunities for building their own connections to the national information infrastructure and the Internet, thereby closing the gap between them and the schools of affluent communities which already have such access. The goals for universal access that are embodied in Section 254 of the Act can be realized if the Commission provides leadership in establishing appropriate support mechanisms and incentives to accelerate the availability of advanced telecommunications in all regions, including rural and high-cost areas. Strengthening the technological capacities of schools and libraries that serve the education and information needs of citizens in low-income communities must be a national priority.

Approximately 30,000 applications for discounted telecommunications services from schools and libraries have met the deadline and the requirements for discounted services. They are ready for funding. The collaborative effort associated with these submissions has generated considerable goodwill and public support for education. Unfortunately, the misguided assaults and criticism of this program have failed to recognize the benefits that are likely to accrue. Federal and state mechanisms that support affordable access for schools and libraries are consistent with the nation's longstanding commitment to the principle of universal access. Those who imply that support for telecommunications services at school and library access represents a new "tax" are misleading the public, and diminishing the contribution of telecommunications technologies in equalizing public access to critical information services.

CCSSO expects all members of the Commission to recognize the potential impact of providing all of the nation's schools and libraries with access to modern telecommunications technologies. I personally am aware of no federal initiative where expectations have been built to such an extent and apparently so threatened that the program might be completely eliminated. I urge the Commission to hold steadfast to its earlier position in supporting the recommendations of the Joint Board.

Respectfully Submitted,

Gordon M. Ambach Executive Director